

Exhibit C

Acampora Ph D Anthony - Vol II

270

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF DELAWARE
3 _____
4 TELCORDIA TECHNOLOGIES, INC.,) Civil Action No.
5 Plaintiff/Counterclaim) 04-875-GMS
6 Defendant,)
7 vs.)
8 LUCENT TECHNOLOGIES, INC.,)
9 Defendant/Counterclaim)
10 Plaintiff.)
11 _____)
12 TELCORDIA TECHNOLOGIES, INC.,) Civil Action No.
13 Plaintiff/Counterclaim) 04-876-GMS
14 Defendant,)
15 vs.)
16 CISCO SYSTEMS, INC.,)
17 Defendant/Counterclaim)
18 Plaintiff.) VOLUME II
19 _____) PAGES 270 - 493

20

21 CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

22

□

271

433

1 (Exhibit Acampora 014 was marked for
2 identification and is annexed hereto.)

3 THE WITNESS: Can I ask a question? Are
4 we finished with the '306-related material? Can I
5 just clear this away to make some space?

6 MR. SMITH: Sure. Go ahead.

7 THE WITNESS: The one I want to hold onto
8 is the court's claim construction.

9 MR. SMITH: Okay. We'll mark next the
10 expert report of Vincent Jones regarding the '633
11 patent.

12 (Exhibit Acampora 015 was marked for
13 identification and is annexed hereto.)

14 BY MR. SMITH:

15 Q. Okay. Dr. Acampora, would you please turn
16 in Exhibit Acampora 014 to page No. 1. Do you see
17 halfway down page No. 1 the sentence beginning "in
18 this regard"?

19 A. I do.

20 Q. Okay. It says, "In this regard, I agree
21 with Dr. Jones' opinions and disagree with Dr.
22 Clark's expert report as set forth below." Okay.

1 We've marked as Exhibit Acampora 015 a copy of Dr.
2 Jones' expert report. Would you take a look at
3 that. Do you agree with and adopt all of the Jones
4 -- opinions in Jones' expert report?

5 MS. MEHTA: Object as to form.

6 THE WITNESS: Let me first say, obviously,
7 I didn't write the Jones report, and if I had been
8 asked to prepare a report on this subject, I'm not
9 sure that I would have stated everything exactly the
10 way that Dr. Jones has. But in terms of his
11 conclusions and the opinions that he expresses, I do
12 agree with those.

13 BY MR. SMITH:

14 Q. Do you disagree with any of his opinions?

15 MS. MEHTA: Object as to form.

16 THE WITNESS: Well, like I said, I didn't
17 write this report, and I might have worded some
18 things a little bit differently, but in terms of the
19 opinions that he's expressed concerning the
20 invalidity of the asserted claims, in light of the
21 references that he's analyzed, I did study those
22 references, and I've drawn the same conclusions that

435

1 he has, largely for the reasons that he has. So I
2 agree with his opinions. I might have stated them
3 differently. I might have emphasized or
4 deemphasized one thing or another. But with regard
5 to his invalidity opinions, I have found none that I
6 disagree with.

7 BY MR. SMITH:

8 Q. Can you point to any part -- I'm sorry?

9 A. Let me amend that. I realize that it's
10 more than a question of invalidity. There are other
11 sections in the Jones report. And, again, with
12 regard to the opinions that he's expressed, these I
13 do agree with.

14 Q. Can you point to any portion of the Jones
15 expert report that you would have written
16 differently?

17 MS. MEHTA: Objection. Form. Counsel,
18 you want him to list all of them?

19 BY MR. SMITH:

20 Q. He mentioned that there were some. I just
21 wanted to know if he knew of any or if he could
22 point to any.

436

1 A. I actually didn't say that there were any.

2 What I said is I might have written it differently.

3 I might have expressed things differently. I might

4 have emphasized or deemphasized one point or other.

5 So I'm interpreting your question -- I think the

6 only way I could respond to your question would be

7 to attempt to rewrite this report right now. I

8 don't think that's what you're asking me to do. Or

9 are you?

10 Q. I just asked you if there were any

11 portions of the report that you're aware of that you

12 would rewrite.

13 A. No. As we sit here now, no. If I were to

14 take a few hours and read it, I might be able to

15 identify some wording that I would have written

16 differently. These are not my words, but as we sit

17 here now, can I identify any such spot? No.

18 Q. Who prepared the Jones expert report?

19 A. It was signed by Dr. Jones, so I believe

20 this to be a report that was prepared by Dr. Jones,

21 and I believe that this contains the opinions of Dr.

22 Jones. I have no reason to believe otherwise.

437

1 Q. To your knowledge, did Dr. Jones rely on
2 any input or information supplied by you in
3 preparing his report?

4 MS. MEHTA: Objection. Form.

5 THE WITNESS: Can I have that question
6 read back, please.

7 (Record read as follows:)

8 "Q. To your knowledge, did Dr. Jones rely on
9 any input or information supplied by you in
10 preparing his report?"

11 THE WITNESS: To my knowledge, no.

12 BY MR. SMITH:

13 Q. Did you participate in the preparation of
14 the report?

15 A. What report?

16 Q. The Jones expert report.

17 A. No.

18 Q. Did you review it prior to the time it was
19 filed?

20 A. No. Well, let me not be so hasty in
21 answering that. No. My answer is correct, I did
22 not.

438

1 Q. When you did first read the report?

2 A. I don't recall. I do notice that it was
3 signed and assuming it was submitted at a time when
4 I was out of the country, so I would be very
5 surprised if I reviewed it before I returned, but I
6 don't know.

7 MR. SMITH: Next I'd like to mark as
8 Exhibit Acampora 016 Dr. Acampora's expert report
9 dealing with noninfringement of the '633 patent.

10 (Exhibit Acampora 016 was marked for
11 identification and is annexed hereto.)

12 THE WITNESS: Thanks.

13 MS. MEHTA: Was this the one that you
14 didn't have an extra copy of?

15 MR. SMITH: That's correct. I'm sorry,
16 but I don't have an extra copy that I can find at
17 the moment.

18 MS. MEHTA: I can share with Steve. No
19 problem.

20 BY MR. SMITH:

21 Q. Would you turn to page 19 of Exhibit
22 Acampora 016.